

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF WISCONSIN

**In the Matter of: Dennis and Renatta Robinson,
Debtors**

**Chapter 13
Case No. 15-23659-gmh**

NOTICE AND REQUEST TO MODIFY CHAPTER 13 PLAN

Dennis and Renatta Robinson, by and through their attorneys, have filed papers with the court requesting modification of the Chapter 13 Plan in the above case.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the court to modify the plan as proposed, or if you want the court to consider your views on the request, then on or before 21 days after service of this notice, you or your attorney must:

File with the court a written request for hearing which shall contain a short and plain statement of the factual and legal basis for the objection. File your written request at:

U. S. Courthouse - Clerk of Bankruptcy Court
517 E. Wisconsin Avenue
Milwaukee, WI 53202-4581

If you mail your request to the court for filing, you must mail it early enough so the court will **receive** it on or before the date stated above. You must also mail a copy to:

Michael S. Georg
Debt Advisors, SC
2600 N. Mayfair Rd., Suite #700
Milwaukee, WI 53226

If you or your attorney do not take these steps, the court may decide that you do not oppose the request and may enter an order modifying the Plan.

Debt Advisors, SC
2600 N. Mayfair Road, Suite 700
Milwaukee, WI 53226
T: 414-755-2400
F: 414-257-0172

REQUEST TO MODIFY CHAPTER 13 PLAN

1. The Proponent of this modification is:

☒ the Debtors;

☐ the Chapter 13 Trustee (post-confirmation modifications only);

☐ the holder of an unsecured claim (Name: _____) (post-confirmation modifications only).

2. This is a request to modify a Chapter 13 Plan (Select A. or B.):

A. ☐ post-confirmation;

B. ☒ pre-confirmation (Select i. or ii.):

i. ☒ Debtor(s)/Debtor(s) attorney certifies that the proposed modification does not materially adversely affect creditors (Local Bankruptcy Rule 3015(b)); or

ii. ☐ Debtor(s)/Debtor(s) attorney certifies that the proposed modification materially adversely affects only the following creditors and a copy of the modification has been served on them (Local Bankruptcy Rule 3015(b)). The creditors affected are:

3. The Proponent wishes to modify the Chapter 13 Plan to do the following: **Increase the monthly Chapter 13 payment to make the plan feasible, to account for the secured claims of Wells Fargo Bank, claims #6 and #10, and to reduce the amount paid to general unsecured creditors.**

4. The reason(s) for the modification is/are: **the Debtors' plan is not currently feasible.**

5. Select A. or B.

A. ☐ The Chapter 13 Plan confirmed or last modified on is modified as follows:

B. X The unconfirmed Chapter 13 Plan dated April 17, 2015 - is modified as follows:

The Debtor's monthly plan payment shall increase to \$738.00 per month beginning in August 2015. The increase is necessary to account for the claims of Wells Fargo Bank, claims #6 and #10. After all other classes have been paid, Trustee will pay to creditors with allowed general unsecured claims a pro rata share of not less than \$0.00 or 0%, whichever is greater.

All remaining terms and provisions of the Plan are unaffected unless specifically addressed herein. In the event of a conflict between the original Plan and the modification set forth above, the latter shall supersede and control.

6. **BY SIGNING BELOW THE PROPONENT OF THE MODIFICATION CERTIFIES THAT, AFTER REVIEW OF THE MODIFICATION AND ALL OTHER TERMS AND PROVISIONS OF THE PLAN, THOSE REMAINING TERMS AND PROVISIONS OF THE PLAN ARE CONSISTENT WITH THE PROPOSED MODIFICATIONS.**

WHEREFORE, the Proponent requests that the court approve the modification to the Chapter 13 Plan as stated herein.

Dated this 2nd day of July, 2015

DEBT ADVISORS, S.C.
/s/ Michael S. Georg
Michael S. Georg, # 1029502

Debt Advisors, SC
2600 N. Mayfair Road, Suite 700
Milwaukee, WI 53226
T: 414-755-2400
F: 414-257-0172

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF WISCONSIN**

**In the Matter of: Dennis and Renatta Robinson,
Debtors**

**Chapter 13
Case No. 15-23659-gmh**

CERTIFICATE OF MAILING

The undersigned, an Attorney, does hereby certify that a copy of the Motion to Modify Chapter 13 Plan filed this day, was electronically served or mailed on July 2, 2015 to the parties listed below to:

1. United States Trustee's Office, via ECF.
2. Rebecca R. Garcia, Chapter 13 Trustee, via ECF.
3. List of Creditors (attached).
4. Debtor.

Dated this 2nd day of July, 2015

DEBT ADVISORS, S.C.

/s/ Michael S. Georg
Michael S. Georg, # 1029502

Debt Advisors, SC
2600 N. Mayfair Road, Suite 700
Milwaukee, WI 53226
T: 414-755-2400
F: 414-257-0172

Label Matrix for local noticing
757-2
Case 15-23659-gmh
Eastern District of Wisconsin
Milwaukee
Thu Jul 2 13:56:01 CDT 2015

American InfoSource LP as agent for
Midland Funding LLC
PO Box 268941
Oklahoma City, OK 73126-8941

Nationstar Mortgage LLC
c/o Gray & Associates, L.L.P.
16345 West Glendale Drive
New Berlin, WI 53151-2841

Attorney James Hemmer
3755 E. Van Norman Ave.
Cudahy, WI 53110-1120

Advanced Radiology PC
P.O. Box 11686
Jackson, TN 38308-0128

BMO Harris Bank N.A.
Attn: BRK-180-RC
770 N. Water St.
Milwaukee, WI 53202-0002

by/cbna
10 Northwest Point Road
Elk Grove Village, IL 60007-1032

(p)BANK OF AMERICA
PO BOX 982238
EL PASO TX 79998-2238

Bureau Investment Group Portfolio No 15 LL
c/o Recovery Management Systems Corp
25 SE 2nd Avenue Suite 1120
Miami FL 33131-1605

Cap1/bostn
PO Box 30253
Salt Lake City, UT 84130-0253

Cap1/bstby
PO Box 6497
Sioux Falls, SD 57117-6497

Cap1/mnrds
26525 N Riverwoods Blvd
Mettawa, IL 60045-3440

Capital One
PO Box 5253
Carol Stream, IL 60197-5253

Chase Mtg
PO Box 24696
Columbus, OH 43224-0696

Citibank/The Home Depot
Citicorp Credit Svcs/Centralized Bankrup
PO Box 790040
Saint Louis, MO 63179-0040

City of Milwaukee
100 E. Wells St. Room 103
Milwaukee, WI 53202-3546

Comenity Bank/bstonstr
3100 Easton Square Pl
Columbus, OH 43219-6232

Department Stores National Bank For Macys B
Bankruptcy Processing
PO Box 8053
Mason, OH 45040-8053

Discover Bank
Discover Products Inc
PO Box 3025
New Albany, OH 43054-3025

Discover Fin Svcs Llc
PO Box 15316
Wilmington, DE 19850-5316

Dsnb Macys
9111 Duke Blvd
Mason, OH 45040-8999

Emergency Medical Care Facilities PC
P.O. Box 197504
Nashville, TN 37219-7504

Fed Loan Serv
PO Box 60610
Harrisburg, PA 17106-0610

Fifth Third Bank
Fifth Third Bank Bankruptcy Department,
1830 E Paris Ave Se
Grand Rapids, MI 49546-6253

Furniturebar
PO Box 94498
Las Vegas, NV 89193-4498

G M A C
15303 S 94th Ave
Orland Park, IL 60462-3825

GEARB/JC Penny
Attention: Bankruptcy
PO Box 103104
Roswell, GA 30076-9104

GEARB/Mills Fleet Farm
Attention: Bankruptcy
PO Box 103104
Roswell, GA 30076-9104

GEARB/Sams Club
Gearb/Sams Club
PO Box 103104
Roswell, GA 30076-9104

GEARB/Steinhafels
Attention: Bankruptcy
PO Box 103104
Roswell, GA 30076-9104

Harris N.a.
Hmo Harris Bank - Bankruptcy Dept.-Brk-1
70 N Water Street
Milwaukee, WI 53202-0002

Hub City Emergency Physicians
P.O. Box 41999
Philadelphia, PA 19101-1999

Internal Revenue Service
Department of the Treasury
Po Box 7346
Philadelphia, PA 19101-7346

Jackson-Madison County General Hospital
P.o. Box 3855
Jackson, TN 38303-3855

(p)LANDMARK CREDIT UNION
P O BOX 510870
NEW BERLIN WI 53151-0870

Landmark Credit Union
5445 Sw Ridge Dr.
New Berlin, WI 53151

Michael P Szatalowicz
568 N. 76th St.
Milwaukee, WI 53218-2725

Milwaukee County Clerk of Court
901 N. 9th St.
Milwaukee, WI 53233-1453

(p)NATIONSTAR MORTGAGE LLC
PO BOX 619096
DALLAS TX 75261-9096

North Shore
5700 W. Bluemound
Brookfield, WI 53005-6073

Office of the U. S. Trustee
517 East Wisconsin Ave.
Room 430
Milwaukee, WI 53202-4510

Professional Account Services Inc.
P.O. Box 188
Brentwood, TN 37024-0188

Quantum3 Group LLC as agent for
Lomenity Bank
PO Box 788
Birkland, WA 98083-0788

Regional Hospital of Jackson
P.O. Box 501077
Saint Louis, MO 63150-1077

Sams Club / GEMB
Attention: Bankruptcy Department
Po Box 103104
Roswell, GA 30076-9104

Plm Entities/glelsi
Great Lakes Borrow Services
PO Box 7860
Madison, WI 53707-7860

Special Procedures Unit
Wisconsin Department of Revenue
PO Box 8901
Madison, WI 53708-8901

Synob/care Credit
C/o Po Box 965036
Orlando, FL 32896-0001

The Bureaus Inc.
Attention: Bankruptcy Dept.
717 Central St.
Evanston, IL 60201-1507

Valley Grove Inpat Srvcs, PLLC
P.O. Box 37967
Philadelphia, PA 19101-0567

Wells Fargo Bank, N.A.
PO Box 10438
Des Moines, IA 50306-0438

Wells Fargo Home Projects Visa
Wells Fargo Financial
Home Campus 3rd Floor
Des Moines, IA 50328-0001

Wi Electric / Wi Energies
Attention: Jill Costello
Po Box 2046 Room A130
Milwaukee, WI 53201-2046

Worlds Foremost Bank N
4800 Nw 1st Street
Lincoln, NE 68521-4463

Wennis A Robinson
1941 N. 63rd St.
Milwaukee, WI 53216-2112

Michael S. Georg
Debt Advisors, S.C.
2600 N. Mayfair Road
#700
Milwaukee, WI 53226-1314

Rebecca R. Garcia
Chapter 13 Trustee
PO Box 3170
Oshkosh, WI 54903-3170

Wenetta B. Robinson
1941 N. 63rd St.
Milwaukee, WI 53216-2112

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g) (4).

Bank Of Amer
P.O. Box 982235
El Paso, TX 79998

LANDMARK CREDIT UNION
P.O. BOX 510870
NEW BERLIN, WI 53151-0870

Nationstar Mortgage
350 Highland Drive
Centex Home Equity Co.
Lewisville, TX 75019

(d)Nationstar Mortgage LLC
P.O. Box 619096
Dallas, TX 75261-9741

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u)Us Bk Rms Cc

End of Label Matrix	
Mailable recipients	57
Bypassed recipients	1
Total	58